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Via ECF

June 20, 2018

Hon. J. Paul Oetken
United States District Court for the Southern
District of New York
40 Foley Square
New York, NY 10007

Re: Craig v. UMG Recordings, Inc., et al., Case No. 16 Civ. 5439 (JPO)

Dear Judge Oetken:

We represent Defendants UMG Recordings, Inc. ("UMG"), Estate of Riley B. King ("Estate") and Kingsid Ventures, Ltd. ("Kingsid" and together with UMG and Estate, "Defendants").

We write in response to Plaintiff's June 20, 2018 letter requesting an extension of the deadline for Plaintiff to respond to Defendants' motion for sanctions (Dkt. No. 74), and pursuant to Rule 3.C. of Your Honor's Individual Practices to request that Defendants be given an extension of their deadline to file a reply in support of their motion for sanctions.

Plaintiff's counsel neglected to disclose to the Court that Defendants agreed to extend the deadline for Plaintiff to respond to Defendants' motion for sanctions by one week to July 5, 2018, **on the condition that** Plaintiff similarly agree to extend Defendants' deadline to file a reply by one week to July 19, 2018.

Plaintiff's counsel did not respond to Defendants' proposal. Plaintiff is now requesting a two and a half week extension of his deadline to respond to Defendants' motion for sanctions. Dkt. No. 74. Should Plaintiff's request be granted, in whole or in part, Defendants respectfully request that Defendants be given an extension of equal time to file a reply brief in support of their motion for sanctions.

This is Defendants' first request for an extension of time to file a reply brief in support of their motion for sanctions. Plaintiff did not consent to this extension.

We thank the Court for its consideration of this matter.

Respectfully submitted,
/s/ Linna Chen
Linna Chen
Attorney At Law

cc: Richard Liebowitz, Esq. (via ECF)